### STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION





PATRICIA W. AHO COMMISSIONER

Maine Wood Turning, Inc. Franklin County New Vineyard, Maine A-1095-71-B-M (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

#### FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

#### I. REGISTRATION

#### A. Introduction

Maine Wood Turning, Inc. (MWT) was issued Air Emission License A-1095-71-A-N on March 6, 2014 permitting the operation of emission sources associated with their wood products manufacturing facility.

MWT has requested a minor revision to their license in order to increase the maximum licensed throughput for their kilns from 1.0 million board feet per year (MMBF/yr) to 2.0 MMBF/yr.

The equipment addressed in this license is located at 1687 New Vineyard Road, New Vineyard, Maine.

#### B. Emission Equipment

The following equipment is addressed in this air emission license:

#### **Process Equipment**

		Pollution Control	Install.	
<u>Equipment</u>	Production Rate	<u>Equipment</u>	<u>Date</u>	
Kilns (6)	2.0 million BF/year	none	1974	

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#### C. Application Classification

This amendment will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

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#### II. BEST PRACTICAL TREATMENT (BPT)

#### A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

#### B. Kilns

MWT operates 6 kilns for drying of lumber used in their manufacturing process. The wood dried is all hardwood, primarily maple and birch. An emission factor of 1.43 lb of VOC per thousand board feet (MBF) was used based on the Forest Products Journal article "Estimated VOC Losses Diring the Drying of Six Eastern Hardwood Species" dated October 2006. MWT shall be limited to the drying of no more than 2.0 MMBF per year, based on a 12-month rolling total.

#### C. Annual Emissions

**Total Annual Emissions** 

MWT shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

- Use of Boiler #1 for 8,760 hours per year
- Drying of 2.0 MMBF/year of hardwood in the kilns
- Limiting VOCs and HAPs from the painting and finishing operations to the numbers below

## Total Licensed Annual Emissions for the Facility Tons/year

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(used to calculate the annual license fee)

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAP Single/Tetal
Boiler #1	11.9	11.9	1.0	19.5	23.9	0.7	Single/Total
	11.9	11.9	1.0	19.5	23.9	0.7	_
Kilns	_		_	_		1.4	_
Painting/	_		-	_		35.0	9.9 / 24.9
Finishing							
Total TPY	11.9	11.9	1.0	19.5	23.9	37.1	9.9 / 24.9

#### III.AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

<u>Pollutant</u>	Tons/Year
$PM_{10}$	25
$SO_2$	50
NO <sub>x</sub>	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

#### **ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment.
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-1095-71-B-M subject to the conditions found in Air Emission License A-1095-71-A-N and in the following conditions.

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# Departmental Findings of Fact and Order Air Emission License Amendment #1

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following shall replace Condition (17) of Air Emission License A-1095-71-A-N:

#### (17) Kilns

- A. MWT shall not exceed a yearly throughput of 2.0 million board feet per year based on a 12-month rolling total. [06-096 CMR 115, BACT]
- B. MWT shall keep monthly records of board feet processed. [06-096 CMR 115, BACT]

DONE AN	D DATED IN A	UGUSTA, MAINE THI	s 29	DAY OF	December	, 2014.
DEPARTM	ENT OF ENVIR	RONMENTAL PROTEC	CTION			
BY: //	Mary Mary	Robert Com	l.	1		
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The term of this amendment shall be concurrent with the term of Air Emission License A-1095-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/17/14

Date of application acceptance: 11/24/14

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

DEC 3 0 2014

State of Maine
Board of Environmental Protection